Letter of Comment No. 2 File Reference: 3-20E Date Received: 9/9/13

THOMAS P. DINAPOLI STATE COMPTROLLER



110 STATE STREET ALBANY, NEW YORK 12236

STATE OF NEW YORK OFFICE OF THE STATE COMPTROLLER

September 4, 2013

Mr. David Bean Director of Research and Technical Activities Governmental Accounting Standards Board Project No. 3-20E 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116

Dear Mr. Bean:

On behalf of the Office of the State Comptroller, we are pleased to respond to the Governmental Accounting Standards Board Exposure Draft (ED), Proposed Statement of the Governmental Accounting Standards Board on concepts related to "Measurement of Elements of Financial Statements. We generally agree with the ED as presented and have no comments.

Thank you for providing the opportunity to comment on this ED. If you have any questions or require further details concerning my comments, please feel free to contact me at (518) 474-3277.

Sincerely,

Suzette Baker, CPA, CGFM

Executive Director

Bureau of Financial Reporting and

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Oil Spill Remediation